

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA)
Plaintiff,)
VS) CASE NO.:19-00406-01-CR-W-RK
KAMEL MAHGUB ELBURKI)
Defendant.)

MOTION FOR TRANSPORT TO FUNERAL

COMES NOW undersigned counsel, S. Chase Higinbotham, Jr. and files this motion on behalf of the Defendant requesting an order for the U.S. Marshal or its designee to transport the Defendant to the funeral of his wife. In support of this motion, the Defendant states the following:

1. On December 12, 2019, a criminal Indictment was filed in the Western District of Missouri charging the Defendant with a number of drug and firearm felonies, along with money laundering.
2. On December 20, 2019, the Defendant had his initial appearance, and on December 27, 2019, undersigned counsel was appointed to represent the Defendant. On January 2, 2020, the detention hearing was held and the Defendant was ordered detained. Thereafter, on August 7, 2020, Lacon Marie Smith entered her appearance on behalf of the Defendant, and on June 28, 2021, Ms. Smith was granted leave to withdraw and

undersigned counsel was reappointed under CJA to represent the Defendant in this matter.

3. Undersigned counsel has learned that the Defendant's wife had died and that the funeral will be July 10, 2021 at 1:00 P.M. at the downstairs of Grace Church, 1915 N. Liberty St., Independence, MO 64050. He respectfully requests that the Court order that the U.S. Marshal or its designee transport the Defendant to allow him to pay his last respects. His family has arranged to pay the costs of the transport if necessary.

WHEREFORE, the defendant requests that The Court order that the U.S. Marshal, or its designee transport the Defendant from the Bates County Detention Center, where he is being housed, to the funeral of his wife on July 10, 2021 at 1:00 P.M. in order for the Defendant to pay his last respects, and if necessary, the family of the Defendant will pay the costs associated with the transport.

Respectfully Submitted,

s/S. CHASE HIGINBOTHAM, JR., #37647
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CERTIFICATE OF SERVICE

The foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: Bruce Rhoades, Assistant United States Attorney, 400 E. 9th St., Kansas City, MO 64106 on the 3rd day of July, 2021.

s/ S. CHASE HIGINBOTHAM, JR.